

**UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS**

IN RE OCULAR THERAPEUTIX, INC.
SECURITIES LITIGATION

Case No. 1:17-cv-12288-GAO

This Document Relates To: All Actions

ORAL ARGUMENT
REQUESTED

**DEFENDANTS' MOTION TO DISMISS THE CONSOLIDATED AMENDED
CLASS ACTION COMPLAINT AND REQUEST FOR ORAL ARGUMENT**

Pursuant to Federal Rules of Civil Procedure 12(b)(6) and 9(b), the Securities Exchange Act of 1934, and the Private Securities Litigation Reform Act of 1995, Defendants hereby move to dismiss all claims against them. The grounds for this motion, which are explained in detail in the accompanying Memorandum of Law and the Declaration of Peter J. Kolovos in support thereof, include that the Consolidated Amended Class Action Complaint fails to state a claim as a matter of law and fails to meet the governing pleading standards.

WHEREFORE, for these reasons and the reasons set forth in the accompanying Memorandum of Law and Declaration in support thereof, Defendants respectfully request that the Court:

1. Enter an order dismissing with prejudice all claims against Defendants;
2. Award Defendants their reasonable attorneys' fees and expenses; and
3. Award any other relief that is fair and just.

REQUEST FOR ORAL ARGUMENT

Defendants respectfully request an oral argument pursuant to Local Rule 7.1(d).

Defendants make this request because they believe that oral argument may assist the Court's consideration of this Motion and they would appreciate the opportunity for counsel to address any issues raised by, or questions posed by, the Court.

Respectfully Submitted,

Dated: July 6, 2018

/s/ Peter J. Kolovos

Michael G. Bongiorno (BBO #558748)

Peter J. Kolovos (BBO #632984)

Wilmer Cutler Pickering Hale and Dorr LLP

60 State Street

Boston, MA 02109

Tel: (617) 526-6000

Fax: (617) 526-5000

michael.bongiorno@wilmerhale.com

peter.kolovos@wilmerhale.com

Counsel for Defendants

LOCAL RULE 7.1(A)(2) CERTIFICATE

I hereby certify that I have conferred with counsel for the Plaintiffs, who did not assent to the relief sought in this Motion.

/s/ Peter J. Kolovos
Peter J. Kolovos

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing was served on the participants of the ECF system in the above-captioned matter on July 6, 2018.

Dated: July 6, 2018

/s/ Peter J. Kolovos
Peter J. Kolovos